

1 3 SEP 1984

# CARROLL

CARROLL PRODUCTS, INC.

PO BOX 66 ROUTE 91  
WOOD RIVER JUNCTION, RI 02894  
TEL. 401 364-7731  
TWX 710 387-7570

DIVISIONS:  
MITCHELL CORPORATION & SCHUYLKILL CHEMICAL CO.  
& TALB INDUSTRIES



SEMS DocID 642604

September 12, 1984

Director Waste Management Division  
U.S. Environmental Protection Agency  
John F. Kennedy Federal Building  
Room 1903  
Boston, Mass. 02203

RCRA RECORDS CENTER  
FACILITY *Agency Health*  
I.D. NO. *R1000102216*  
FILE LOC. *R-1C*  
OTHER \_\_\_\_\_

Att: Ms. Lauren Stiller Rikleen

Dear Ms. Rikleen:

On September 5th we received your Administrative Compliance Order and Assessment of Penalties (RC RA Docket No.:84-1057). We have been working diligently for some time now in order to correct the deficiencies to which you refer. The purpose of this letter is to inform you of the status of our compliance efforts as of this date, responding to the "Orders" beginning on page 8:

- 1a The contents of the containers which prior to your Administrative Order had been sampled for testing have now all been identified.

Regarding the four storage tanks:

Tank #1 is empty.  
Tank #2 is empty of liquid but contains approx. 200 lbs. of a rust-salt mixture.  
Tank #3 is empty; the fire-fighting water which had been temporarily stored here has been removed under DEM supervision and the tank is now empty.  
Tank #4 is empty

- b All containers of hazardous waste are properly labeled and dated.
- 2a A revised contingency plan is being sent to EPA under separate cover.
- b Also, a copy of this plan is being mailed to the local authorities.
- c A revised facility training program is being sent to EPA under separate cover.

September 12, 1984

- d The facility training program will be implemented be a meeting with our personnel, scheduled for September 18, 1984.
- 3a Three drums of hazardous waste, which are not leaking, remain to be re-packaged. The re-packaging will definitely be completed by your deadline - September 25, 1984. None of the hazardous waste containers on site are leaking.
- b All hazardous waste containers are properly closed.
- c All hazardous waste containers are stored in a manner to protect them from leaking.
- d The metal plate near the entrance to the Quonset Hut storate area has been sealed with concrete. The hazardous waste drums are in the process of being removed from the Quonset Hut storate area into a new existing, fully diked building.
- 4 All hazardous wastes now in the facility storage area will be removed from the facility considerably before your 90 day limit.
- 5 The Diazo Bulking Tank is scheduled to be pumped out September 13, 1984 and will then be decommissioned. Since the product which generated this Diazo waste stream is no longer manufactured at this site, the need bulking tank has been eliminated.

We will continue to furnish your office with updates of our compliance progress at regular intervals. Attorney Bierlein will be phoning you shortly.

Very truly yours,

CARROLL PRODUCTS, INC.

*Arthur F. Schwartz*  
Arthur F. Schwartz  
Director of Chemical Operations

cc: Rhode Island Compliance Officer  
Mr. Lawrence W. Bierlein  
Mr. Barry Muller, R.I. DEM  
Sandy Crystal, EPA-HQ  
Barbara O'Toole  
Tom Michel